

REMARKS

The Office action of September 27, 2004 has been received and its contents carefully noted.

Claims 1-5, 21-22, and 28-33 are pending in the application. Claims 6-20, and 23-37 have been canceled without prejudice. Claims 28-33 have been added.

Claims 1-5, and 21-22 stand rejected under § 103(a) as being unpatentable over Kobayashi et al. ("Kobayashi") (U.S. Patent No. 6,466,625). Applicants respectfully traverse these rejections, and request allowance for the following reasons.

The Present Claims are Patentable Over the Cited References

**Claims 1-5, and 21-22 are not anticipated by Kobayashi**

Claims 1-5, and 21-22 were rejected under § 102(e) in view of Kobayashi. Kobayashi fails to disclose the features recited in these claims such as a conversion controller for controlling the picture conversion unit based on the coding difficulty information to convert the picture format using at least temporal conversion, or converting a picture data format based on coding difficulty information using at least temporal conversion.

In strong contrast, Kobayashi discloses a picture signal processing method that solely uses a pre-filter 23 (e.g., spatial conversion only) to prepare input picture data for encoding. (see FIGs. 17, 24; col. 21, lines 49-67; col. 22, lines 1-23). Kobayashi makes completely no mention of using temporal

conversation in contrast to the recited feature. As clearly illustrated in FIG. 24, the pre-filter 23 solely low-pass filters, and performs adder/multiplier operations on the input picture signal S300 (spatial conversion only) and makes no mention of performing any type of temporal conversion on the input picture signal.

Further, the Action appears to perhaps confuse the control processing (e.g., pre-filter control 28) for obtaining the pre-filter coefficients with the actual filtering processing being performed by the pre-filter 23 on the actual input picture data S21. Kobayashi discloses a one-device-filtering-process (e.g. pre-filter 23) that inputs moving picture data S21, performs low-pass filtering and additional arithmetic operations, and then outputs processed moving picture data S22 for encoding (see FIGs. 17, 24).

However, there is no mention of using temporal conversion on the input picture data in strong contrast to the recited feature.

There is a significant distinction between performing filtering/arithmetic operations (spatial conversion only) on input picture data as disclosed by Kobayashi as opposed to converting the picture format using at least temporal conversion as recited. Kobayashi fails to disclosed the recited features making the claimed invention patentably distinct and non-obvious from the cited reference.

Conclusion

In view of the amendments and remarks submitted above, it is respectfully submitted that all of the remaining claims are allowable and a Notice of Allowance is earnestly solicited.

If necessary, the Commissioner is hereby authorized in this, concurrent, and future replies to charge payment or credit any overpayments to Deposit Account No. 02-2448 for any additional fees required under 37 C.F.R. §§1.16 or 1.17; particularly, extension of time fees.

The Examiner is invited to contact the undersigned at (703) 205-8000 to discuss the application.

Respectfully submitted,

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